DAVID E. RAYBORN Rayborn Law Office P. O. Box 1 Pocatello, ID 83204-0001 (208) 233-3914 Idaho State Bar #3308 U.S. COURTS

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CLEAR FARMS

Attorney for R. Sam Hopkins, Chapter 7 Trustee

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO

In re:	)	
	)	Case No. 99-41879
VLADIMIR PANIOUCHKINE	)	
TATYANA PANIOUCHKINE,	)	MOTION AND NOTICE FOR
	)	TURNOVER FROM DEBTOR OF
Debtors.	)	INFORMATION

The Trustee appointed in the above entitled case moves the Court for an Order pursuant to 11 U.S.C. 521(3) and (4) for an Order requiring the Debtors to turnover information relating to property of the estate forthwith so the Trustee may proceed with proper administration of the pending Bankruptcy proceeding.

## Information to be turned over:

- 1. COPY OF AGREEMENT WITH SYSTRAN;
- 2. ADDRESS, TELEPHONE NUMBER AND CONTACT PERSON/ACCOUNT REPRESENTATIVE AT SYSTRAN;
- 3. DATE(S) THE ACCOUNTS WERE SOLD TO SYSTRAN:
- 4. ITEMIZATION OF THE DISPOSITION OF MONIES RECEIVED FROM SYSTRAN.

You are hereby notified that the Trustee has requested an Order compelling the turnover of the information listed above and.

YOU ARE HEREBY NOTIFIED that if you wish to contest the Trustee's motion, a written reply to the motion must be filed in duplicate within fifteen (15) days from the date of this motion. File the original (1) with the U. S. Bankruptcy Court, 801 East Sherman Street, Pocatello, ID 83201; and (2) a copy with the Trustee. Failure to file a written reply will result in the Trustee requesting the Court enter an Order directing the Turnover.

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DATED this 26 day of June, 2001.

DAVID E. RAYBORN

Attorney for Chapter 7 Trustee

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 2 day of June, 2001, I served a true and correct copy of this document upon the following, by the method indicated:

Jay D. Sudweeks	[X]	U. S. Mail
May, Sudweeks & Browning	[]	Hand Delivery
P. O. Box 1846	[]	Facsimile
Twin Falls, ID 83303-1846	[]	Courthouse Mail Box
Vladimir Paniouchkine	[X]	U. S. Mail
Tatyana Paniouchkine	[]	Hand Delivery
904 Acacia Avenue	[]	Facsimile
Glendale, CA 91205	[]	Courthouse Mail Box
R. Sam Hopkins	[X]	U. S. Mail
Chapter 7 Bankruptcy Trustee	[]	Hand Delivery
P. O. Box 3014	[]	Facsimile
Pocatello, ID 83204-3014	[]	Courthouse Mail Box
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DAVID E. RAYBORN

Attorney for Chapter 7 Trustee